

2024-1492, 2024-1493

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

CPC PATENT TECHNOLOGIES PTY LTD.,

Appellant

v.

ASSA ABLOY AB, ASSA ABLOY INC., HID GLOBAL CORP., ASSA ABLOY
GLOBAL SOLUTIONS, INC., MASTER LOCK COMPANY, LLC,

Appellees

Appeals from the United States Patent and Trademark Office,
Patent Trial and Appeal Board in Nos. IPR2022-01093, IPR2022-01094

**UNOPPOSED MOTION OF APPELLEES FOR AN EXTENSION OF TIME
TO FILE RESPONSE BRIEF**

Pursuant to Federal Circuit Rules 26(b) and 31(a), Appellees ASSA ABLOY AB, ASSA ABLOY Inc., HID Global Corp., ASSA ABLOY Global Solutions, Inc. and Master Lock Company, LLC move for a 30-day extension of time to file their response brief. Appellees' response brief is currently due on July 8, 2024. If the extension is granted, the 30-day extension of time will extend the due date August 7, 2024. This is Appellees' first request for an extension of time in this appeal. Counsel for Appellees has conferred with counsel for Appellant, CPC Patent

Technologies Pty Ltd., who confirmed that CPC does not oppose this motion for the requested extension of time for Appellees' response brief.

As set forth in the attached declaration of attorney Lionel M. Lavenue, Appellees' motion is made in good faith and not for the purpose of delay. Counsel for Appellees will be engaged in other previously scheduled activities and other ongoing litigation matters requiring substantial attention in the period overlapping with the time to prepare and file Appellees' response brief in this case. Appellees respectfully submit that the proposed 30-day extension is both necessary and reasonable.

For the foregoing reasons, Appellees respectfully request a 30-day extension of time within which to file its response brief, to, and including, August 7, 2024.

Date: May 31, 2024

Respectfully submitted,

/s/Lionel M. Lavenue

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ABLOY Global Solutions, Inc. and Master
Lock Company, LLC*

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DECLARATION OF LIONEL M. LAVENUE

1. I, Lionel M. Lavenue, am a partner with Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, and counsel for Appellees ASSA ABLOY AB, ASSA ABLOY Inc., HID Global Corp., ASSA ABLOY Global Solutions, Inc. and Master Lock Company, LLC in this appeal.

2. All the facts set forth in Appellees' motion are, to the best of my knowledge, true and correct.

3. This motion is made in good faith and not for the purpose of delay or other procedural advantage.

4. The requested 30-day extension of time is needed because of personal and professional obligations during June and July, including deadlines in *inter partes* reviews, district court litigation, and other appeals before this Court, that limit the amount of time that can be spent on preparing Appellees' Response Brief. The requested 30-day extension is needed to allow the attorneys working on this appeal to properly prepare the Response Brief, and to allow sufficient time for Appellees to review and comment on the brief.

5. Appellees contacted counsel for Appellant about this extension, who indicated that Appellant does not oppose the requested 30-day extension.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: May 31, 2024

/s/Lionel M. Lavenue
Lionel M. Lavenue

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

CERTIFICATE OF INTEREST

Case Number: 2024-1492, 2024-1493

Short Case Caption: CPC Patent Technologies Pty Ltd. v. Assa Abloy AB
ASSA ABLOY AB, ASSA ABLOY Inc., HID Global Corp.,
ASSA ABLOY Global Solutions, Inc., Master Lock

Filing Party/Entity: Company, LLC

Instructions:

1. Complete each section of the form and select none or N/A if appropriate.
2. Please enter only one item per box; attach additional pages as needed, and check the box to indicate such pages are attached.
3. In answering Sections 2 and 3, be specific as to which represented entities the answers apply; lack of specificity may result in non-compliance.
4. Please do not duplicate entries within Section 5.
5. Counsel must file an amended Certificate of Interest within seven days after any information on this form changes. Fed. Cir. R. 47.4(c).

I certify the following information and any attached sheets are accurate and complete to the best of my knowledge.

Date: May 31, 2024 Signature: /s/ Lionel M. Lavenue

Name: Lionel M. Lavenue

1. Represented Entities. Fed. Cir. R. 47.4(a)(1).	2. Real Party in Interest. Fed. Cir. R. 47.4(a)(2).	3. Parent Corporations and Stockholders. Fed. Cir. R. 47.4(a)(3).
Provide the full names of all entities represented by undersigned counsel in this case.	Provide the full names of all real parties in interest for the entities. Do not list the real parties if they are the same as the entities. <input type="checkbox"/> None/Not Applicable	Provide the full names of all parent corporations for the entities and all publicly held companies that own 10% or more stock in the entities. <input type="checkbox"/> None/Not Applicable
ASSA ABLOY AB	None	ASSA ABLOY AB
ASSA ABLOY Inc.	None	ASSA ABLOY AB
HID Global Corporation	None	ASSA ABLOY AB; ASSA ABLOY Inc.
ASSA ABLOY Global Solutions, Inc.	None	ASSA ABLOY AB; ASSA ABLOY Inc.
Master Lock Company, LLC	ASSA ABLOY Residential Group, Inc.	Fortune Brands Outdoors & Security, LLC; Fortune Brands Innovations, Inc.

☐ Additional pages attached

4. Legal Representatives. List all law firms, partners, and associates that (a) appeared for the entities in the originating court or agency or (b) are expected to appear in this **court** for the entities. Do not include those who have already entered an appearance in this court. Fed. Cir. R. 47.4(a)(4).

☐ None/Not Applicable

☐ Additional pages attached

Dion Bregman
Morgan, Lewis & Bockius
LLP

Andrew Devkar
Morgan, Lewis & Bockius
LLP

James Kristas
Morgan, Lewis & Bockius
LLP

5. Related Cases. Other than the originating case(s) for this case, are there related or prior cases that meet the criteria under Fed. Cir. R. 47.5(a)?

☒ Yes (file separate notice; see below) ☐ No ☐ N/A (amicus/movant)

If yes, concurrently file a separate Notice of Related Case Information that complies with Fed. Cir. R. 47.5(b). **Please do not duplicate information.** This separate Notice must only be filed with the first Certificate of Interest or, subsequently, if information changes during the pendency of the appeal. Fed. Cir. R. 47.5(b).

6. Organizational Victims and Bankruptcy Cases. Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6).

☒ None/Not Applicable

☐ Additional pages attached

FORM 19. Certificate of Compliance with Type-Volume Limitations

Form 19
July 2020

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITATIONS

Case Number: 2024-1492, 2024-1493

Short Case Caption: CPC Patent Technologies Pty Ltd. v. Assa Abloy AB

Instructions: When computing a word, line, or page count, you may exclude any items listed as exempted under Fed. R. App. P. 5(c), Fed. R. App. P. 21(d), Fed. R. App. P. 27(d)(2), Fed. R. App. P. 32(f), or Fed. Cir. R. 32(b)(2).

The foregoing filing complies with the relevant type-volume limitation of the Federal Rules of Appellate Procedure and Federal Circuit Rules because it meets one of the following:

- ☒ the filing has been prepared using a proportionally-spaced typeface and includes 214 words.
- ☐ the filing has been prepared using a monospaced typeface and includes _____ lines of text.
- ☐ the filing contains _____ pages / _____ words / _____ lines of text, which does not exceed the maximum authorized by this court's order (ECF No. _____).

Date: 05/31/2024

Signature: /s/ Lionel M. Lavenue

Name: Lionel M. Lavenue